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Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

KIMBERLY ARNOLD,

Case No. 3:10-CV-1025-AC

Plaintiff,

v.

**PLAINTIFF'S MOTION FOR
ATTORNEY FEES AND COSTS**

PFIZER INC.,

ORAL ARGUMENT REQUESTED

Defendant.

CERTIFICATE REQUIRED BY LR 7-1(A)

The undersigned certifies that the parties made a good faith effort to confer by telephone to resolve the dispute and have been unable to do so. Defendant objects to the amount of attorney fees and costs requested by Plaintiff and intends to file objections with the court.

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MOTION

Pursuant to 42 U.S.C. § 12205, 42 U.S.C. § 12117, 42 U.S.C. § 2000e-5, 42 U.S.C. § 1988, ORS 20.107, ORS 659A.885, Fed. R. Civ. Pro. 54, and LR 54, Plaintiff moves the Court for an award of attorneys' fees, expert witness fees, and other costs and expenses. Plaintiff requests that the court award attorney fees, costs, and expenses as follows:

Dan Snyder attorney fees	\$361,000.00
Erin McCool attorney fees	\$42,658.00
Cindy Gaddis attorney fees	\$46,897.50
Carl Post attorney fees	\$22,148.50
Hart Wagner fees	\$9,885.00
Total fees	\$482,589.00
Hart Wagner expenses	\$383.49
Plaintiff's Expenses	\$52,625.02
Total expenses	\$53,008.51
Total	\$535,597.51

This motion is supported by Plaintiff's Memorandum in Support of Attorney Fees and Costs; the Declarations of Daniel Snyder, Cindy Gaddis, Erin McCool, and Carl Post in Support of Attorney Fees and Costs; and Plaintiff's Bill of Costs and corresponding exhibits.

Dated: April 1, 2015

Law Offices of Daniel Snyder

/s/ Carl Post

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